ID: CCA-113445-10 Number: **201049040** 

Office:

UILC: 56.00-00

Release Date: 12/10/2010

From:

**Sent:** Wednesday 11/3/2010 4:45 PM

To: Cc:

Subject: RE: Follow up Question - RE CCA

As we discussed, we agree with your conclusion. Lines 3 and 8 of Form 6251 do not apply to taxes incurred in connection with a trade or business. See  $\S$  56(b)(1)(A), (b)(1)(D); Reg  $\S$  1.62-1T(d).